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February 20, 2012

Ms. Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: Global Telecom & Technology Americas, Inc.  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

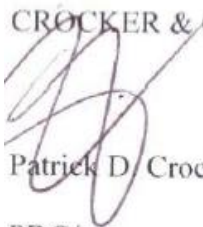
Dear Ms. Dortch:

Global Telecom & Technology Americas, Inc., by its undersigned attorneys, hereby submits its 2011 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER

  
Patrick D. Crocker

PDC/crg

Enclosures

cc: Best Copy and Print, Inc. (via e-mail [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))

**Annual 47 C.F.R. § 64.2009(c) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(c) CPNI Certification for 2011

Date filed: February 20, 2012

Name of Company Covered by this Certification: Global Telecom  
& Technology Americas, Inc.

Form 499 Filer ID: 820586

Name of Signatory: Chris McKee

Title of Signatory: Secretary

I am the Secretary of Global Telecom & Technology Americas, Inc. and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Global Telecom & Technology Americas, Inc. I have personal knowledge that Global Telecom & Technology Americas, Inc. has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Global Telecom & Technology Americas, Inc. received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Global Telecom & Technology Americas, Inc. has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2011. Global Telecom & Technology Americas, Inc. will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Global Telecom & Technology Americas, Inc. is taking to protect CPNI.

This certification is dated this 20 day of February, 2012.

  
Chris McKee  
Secretary  
Global Telecom & Technology Americas, Inc.

## **Customer Proprietary Network Information Certification Attachment A**

Global Telecom & Technology Americas, Inc. has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Global Telecom & Technology Americas, Inc. provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. Global Telecom & Technology Americas, Inc.'s customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Global Telecom & Technology Americas, Inc.'s policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

### **Safeguarding against pretexting**

- Global Telecom & Technology Americas, Inc. takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Global Telecom & Technology Americas, Inc. is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### **Training and discipline**

- Global Telecom & Technology Americas, Inc. has an express disciplinary process in place for violation of the Global Telecom & Technology Americas, Inc.'s CPNI practices and procedures. Global Telecom & Technology Americas, Inc. employees are required to review and abide by Global Telecom & Technology Americas, Inc.'s Code of Conduct, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

### **Global Telecom & Technology Americas, Inc.'s use of CPNI**

- Global Telecom & Technology Americas, Inc. uses CPNI for the following purposes:
  - (1) To initiate, render, maintain, repair, bill and collect for services
  - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - (3) For network maintenance; and
  - (4) As required by law.

- Global Telecom & Technology Americas, Inc. does not distribute CPNI to third parties for their sales or marketing purposes. Nor does Global Telecom & Technology Americas, Inc. share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- Global Telecom & Technology Americas, Inc. does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. Global Telecom & Technology Americas, Inc. will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

#### **Additional safeguards**

- Global Telecom & Technology Americas, Inc. does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- Global Telecom & Technology Americas, Inc. has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Global Telecom & Technology Americas, Inc. designates one or more officers, as an agent or agents of the Global Telecom & Technology Americas, Inc., to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- Global Telecom & Technology Americas, Inc. does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, Global Telecom & Technology Americas, Inc. will comply with all applicable breach notification laws.